

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF MASSACHUSETTS

ANNE M. CAHILL,

*Debtor,*

Docket Number 1:20-bk-10814  
Chapter 13

**OBJECTION OF THE DEBTOR TO THE  
PROOF OF CLAIM OF CITIZENS BANK N.A., FOR UNTIMELINESS**

NOW COMES Anne M. Cahill pursuant to Fed. R. Bankr. P. 3007 and objects to the proof of claim 9 filed by Citizens Bank N.A. ("Creditor")[Claim 9]. In support of this objection, the Debtor states as follows.

**I. Facts.**

1. On March 20, 2020, Debtor filed her voluntary petition.
2. On June 10, 2020, the Creditor filed its proof of claim in this matter.
3. The proof of claim alleges that Debtor owes Creditor \$24,481.62.

**II. Argument.**

3. By order of the Court, proofs of claim were due on or before May 29, 2020.
4. Pursuant to Standing Order 2017-05, MLBR Appendix 1, Rule 13-13(a) provides:  
"To be eligible to have an allowed claim, a creditor, ... must timely file a proof of claim... A proof of claim is timely filed if filed within the deadlines set forth in Fed. R. Bankr. P. 3002."
5. In relevant part, Fed. R. Bankr. P. 3002(c) states:  
"a proof of claim is timely filed if it is filed not later than 70 days after the order for relief under that chapter or the date of the order of conversion to a case under chapter 12 or 13."

6. The proof of claim was due on May 29, 2020, seventy (70) days after March 20, 2020.

7. Creditor offers no reason for the Court to accept this late proof of claim.

**III. Conclusion.**

For the foregoing reasons, Creditor's proof of claim should be denied.

**NOTICE PURSUANT TO RULE 13-13**

**Please take note that a Response to this Objection must be filed within 30 days of the filing of the objection with the Court.**

Respectfully submitted,

Anne M. Cahill,

by her attorney,

/s/ Ira H. Grolman  
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Date: June 10, 2020

**CERTIFICATE OF SERVICE**

On this day, June 10, 2020, I certify that I served or caused to be served a true and accurate copy of this document on the chapter 13 trustee and the United States Trustee by ECF and on the Debtor and Citizens Bank N.A., at One Citizens Bank Way JCA115, Johnston, RI 02919, by first class mail.

/s/Ira H. Grolman  
Ira H. Grolman